

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

ADWOWA JACOBS,	§	
	§	
Plaintiff,	§	
v.	§	CIVIL ACTION NO.
	§	
ELECTRONIC DATA SYSTEMS	§	2:05-CV-925-MHT-SRW
CORPORATION AND JEFF	§	
WILLIAMS,	§	
	§	
Defendants.	§	

**AFFIDAVIT IN SUPPORT OF EXPENSES AND ATTORNEYS' FEES**

THE STATE OF TEXAS	§	
	§	KNOW ALL PERSONS BY THESE
	§	PRESENTS:
COUNTY OF HARRIS	§	

On this date, Rachel M. Smith personally appeared before me, the undersigned Notary Public, and after being duly sworn stated the following under oath:

1. My name is Rachel Smith. I am currently over the age of twenty-one (21). I have never been convicted of a felony or a crime of moral turpitude. I am under no legal disability and I am fully competent to make this Affidavit. I am an attorney with Baker & Hostetler LLP and legal counsel handling this matter for Electronic Data Systems Corporation ("EDS"). As such, I have personal knowledge of the facts stated herein and they are true and correct. I declare under the penalty of perjury that the foregoing is true and correct.

2. I have been a licensed attorney in the State of Texas since 2004. I am familiar with the average and reasonable hourly rate charged by attorneys with my experience, and I believe the rate to be \$185.00 per hour.

3. On September 15, 2006, the Court ordered payment by Plaintiff's counsel of Defendants' reasonable fees and expenses incurred in connection with Defendants' Joint Motion to Dismiss ("Motion").

4. I performed the necessary research and drafting of the Motion, as well as preparing Ms. Jacobs for the hearing on the Motion. Tonya Jacobs, a partner with Baker & Hostetler, argued the Motion at a rate of \$345.00 an hour. In doing so, Baker & Hostetler billed thirteen (13) hours toward the preparation, filing and arguing of this Motion, which resulted in a reasonable attorneys' fee in the sum of \$2,405.00.

5. Reasonable expenses incurred in the handling and filing of the Motion included copies and postal fees in the amount of \$8.80.

"Further Affiant sayeth not."

Signed this 22<sup>nd</sup> day of September, 2006.

R. Smith

Rachel M. Smith

SUBSCRIBED AND SWORN BEFORE ME on September 22, 2006.

Criseda S. Stevens

Notary Public in and for the State of Texas  
My commission expires:

12/23/09

